

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CENGAGE LEARNING, INC.; BEDFORD,
FREEMAN & WORTH PUBLISHING GROUP,
LLC D/B/A MACMILLAN LEARNING;
MACMILLAN HOLDINGS, LLC; ELSEVIER
INC.; ELSEVIER B.V.; and MCGRAW HILL
LLC,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 1:24-cv-04274-JLR-BCM

**DECLARATION OF NICHOLAS A. ROETHLISBERGER
IN SUPPORT OF MOTION FOR ADMISSION *PRO HAC VICE***

NICHOLAS A. ROETHLISBERGER, pursuant to 28 U.S.C. § 1746, declares under penalty of perjury as follows:

1. I am a partner at the law firm of Kwun Bhansali Lazarus LLP.
2. I submit this declaration in support of my Motion to Admit Counsel *pro hac vice* in the above-captioned matter.
3. I have been a member in good standing of the Bar of California since December 9, 2011.
4. I attach a Certificate of Good Standing from the Supreme Court of the State of California, which was issued within thirty days of this filing, as **Exhibit A** to my Motion to Admit Counsel *pro hac vice*.
5. I have never been convicted of a felony or been the subject of any criminal conviction.

6. I have never been censured, suspended, disbarred or denied admission or readmission by any court.

7. I have never been the subject of a disciplinary sanction and there are no disciplinary proceedings presently pending against me.

Wherefore your declarant respectfully submits that he be permitted to appear as counsel pro hac vice in this one case on behalf of Defendant Google LLC.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 5, 2025

/s/ Nicholas Roethlisberger
Nicholas Roethlisberger